

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-CR-245 (NEB/JFD)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	DEFENDANT’S PROPOSED
v.)	VOIR DIRE
Muse Mohamud Mohamed,)	
)	
Defendant.)	

Pursuant to the January 20, 2022, Trial Notice and Pretrial Order [Docket No. 34], the defendant Muse Mohamud Mohamed, through his attorney Charles F. Clippert, hereby requests the Court ask the jury the following questions or address the topics in a manner that the Court finds is appropriate.

1. Mr. Mohamed was born in Somalia but is a United States Citizen. He will likely use an interpreter during the trial.
2. What role will Mr. Mohamed’s race and perceived country of origin have in your deliberation?
3. You are instructed that the fact that Mr. Mohamed has the assistance of an interpreter is not a factor for your consideration. The Court has ordered that an interpreter assist Mr. Mohamed throughout the trial.

This offense occurred during the 2020 election. A time so divisive that the U.S. Capital was attacked by individuals who did not believe that the 2020 was legitimate. Based on this concern, the defense requests that the court ask the following questions.

1. Do you believe that the elections from 2020 were fair? Explain why.

2. Do you believe that President Joe Biden fairly and lawfully won the 2020 election? Explain why or why not.

Dated: April 19, 2022

Respectfully submitted,

/s/ Charles F. Clippert
BY: Charles F. Clippert
Attorney for Defendant